

SEP 13 1984

Ref: 8WM-DW

James Johnson  
143 Union Boulevard, Suite 760  
Lakewood, Colorado 80228

Re: UIC Permit Applications  
EPU 110-XD MTS21PE-0007  
Goings Gov't #1 MTS21PW-0008  
Buck Elk #2 MTS21PE-0009

Dear Mr. Johnson:

Thank you for your response to our letter of August 20. We are pleased to inform you that the UIC permit applications for the three salt water disposal wells referenced above are now complete. We are currently in the process of writing draft permits for these wells. Once the draft permits have been prepared, EPA will issue a public notice requesting public comment on the draft permits.

Laura Clemmens is the permit writer assigned to your permits. Inquiries should be addressed to Ms. Clemmens at the Denver address or at (303) 844-2731.

Sincerely yours,

Max H. Dodson, Director  
Water Management Division

cc: Bob Coffia

8WM-DW  
Clemmens  
9/13/84

BRC  
Hobson  
09-13-84

8WM-DW  
Crotty  
9/13/84

8WM-DW  
Frenette  
9/13/84

8WM  
Humbert  
MHD  
9/13/84

AUG 20 1984

Ref: BWM-DW

Mr. James E. Johnson, Production Manager  
Grace Petroleum Corporation  
143 Union Boulevard, Suite 760  
Lakewood, Colorado 80228

Re: Underground Injection Control (UIC)  
Permit Applications for:  
EPU 110XD (Permit # NTS21PE-0007)  
Goings Government (Permit # NTS21PW-0008)  
Buck Elk #2 (Permit # NTS21PE-0009)

Dear Mr. Johnson:

On August 6, 1984, we received your applications for UIC permits to allow the injection of produced brine into the above-referenced wells. We have determined that there are a number of deficiencies and/or parts missing from the applications. Accordingly, we will not be able to declare the applications complete and begin processing them until this information has been received. Certain deficiencies are common to all three of the applications and they are listed below. Well-specific deficiencies follow the general listing. The problems that must be addressed on each of the three permit applications are as follows:

1. SIGNATORY (40 CFR Section 144.32 (a) and (b)): The person who signs the permit applications must be either: 1) A principal executive officer of at least the level of a Vice-President or; 2) A duly authorized representative so identified in writing by a Vice-President or higher.
2. DESCRIPTION OF INJECTION OPERATION (40 CFR Section 144.31(e)(1)): In the interest of expediency and clarity, please submit a brief (one or two paragraph) description of each injection operation (e.g., Well # 1 is injecting into the X formation and the injection fluid will be composed of produced water from well #'s 2 and 3, producing from the Y formation).
3. PERMIT APPLICATION FORM: Please note that on Part V of your application forms, we have added the appropriate Standard Industrial Classification (SIC) code for your operation, which is 1311.
4. AREA OF NOTIFICATION (40 CFR Section 147.1355 (b) and (c)): You are required to give separate notice of intent to apply for a permit to each owner or tenant of the land within a quarter-mile of the subject well. Since the Goings Government well is located on Indian Lands, the area of notification is extended to a one half-mile radius of the well.

L. Clemmens: 8-16-84 : W 7333P, Ex 2731

Clemmens  
BWM-DW  
8/16/84

BWM-DW  
R.L. Long  
8/16/84

BWM-DW  
Fennell  
8/16/84

BRC  
Hudson  
08/16/84

BWM  
Doris  
8/17/84

#105

This notice shall include: 1) the company's name and address; 2) a brief description of the injection activity including well name and location, depth of injection zone, maximum injection pressure and volume, and nature of fluid to be disposed; 3) the EPA contact person; and 4) a statement that opportunity to comment on the injection operation will be announced by EPA when a draft permit has been written.

When you have given notice, please submit a list of the names and addresses of the owners of record to whom you have sent notice to this office.

5. TOPOGRAPHIC MAP (40 CFR Section 144.31 (e)(7)): The UIC regulations require that a topographic map (or other map, if a topographic map is unavailable) be provided with the application. The map should show the area extending one mile beyond the boundary of the subject well. Please submit such a map for each of the three wells.

6. NAME AND DEPTH OF USDWs (Attachment E): A submittal of data on USDWs which may be affected by the injection operation is required. An Underground Source of Drinking Water (USDW) is any aquifer that is currently used as a source of drinking water, or has a Total Dissolved Solids level of 10,000 mg/l or less. It is EPA policy to expect that any USDW overlying an injection zone has the potential for becoming contaminated by that injection. Because of the depth of these wells, it is highly unlikely that there are not any USDWs above the injection zones. Please identify all USDWs (Fox Hills, Judith River, etc.) penetrated by the well shafts, and explain why they will not be adversely affected by the injection operation.

7. GEOLOGICAL DATA ON INJECTION AND CONFINING ZONES (Attachment G): The data submitted on the confining zones is incomplete. Please submit data on the thickness, depth and fracture pressure of each of the confining zones. If possible, please submit a local geological map and a site-specific stratigraphic column.

8. OPERATING DATA (Attachment H): Although you have indicated that the injected fluid consists of produced water from production wells and have provided us with water analyses, the information is sketchy and unclear. Please indicate ALL the fluid sources for each injection well, as well as a water analysis for each source well or a representative analysis for multiple source wells. If such analyses are not available, please advise us.

9. PLUGGING AND ABANDONMENT PLAN (Attachment Q): Please resubmit the plugging and abandonment data for each well on EPA Form 7520-14, Plugging and Abandonment Plan. We have enclosed three of these forms for your convenience.

10. NECESSARY RESOURCES (Attachment R): Please submit a copy of the surety bond you have referenced for each well.

WELL-SPECIFIC DEFICIENCIES

In addition to addressing the issues mentioned above for all three wells, please respond to the well-specific issues listed below:

GOINGS GOVERNMENT:

1. The downhole diagram for this well is unsatisfactory. You have stated that because the well was abandoned and reentered, the depth of the surface casing is unknown. The protection of USDWs requires that we know the depth of the surface casing and assure that the surface casing is cemented to the surface. We request that you either provide us with the original completion report for this well showing the depth of the surface casing, or that you run an appropriate log to determine the depth of the surface casing and the quality of the cement bond. Also, what does the 7" top represent? Casing? Cement? Please delineate all cement tops. What is the total depth of the well?

EPU 110XD:

1. The water analysis submitted as part of Attachment H (Operating Data) is insufficient for our purposes. There is no indication of the source of the analyzed water, nor is there any TDS level shown. Please submit a more appropriate analysis for this well. See comment 8 on Page 2.

2. We have one question on the wellbore diagram. Is the EPU 110XD cemented from the TD (7359') to 4700' as indicated?

As soon as we receive all the information listed above, we will be able to proceed with processing the permits. Please submit the required information to the Denver Regional office as soon as possible, but no later than September 10th. If you have any questions regarding this letter, or on the status of your applications, please contact Laura Clemmens at (303)844-2731.

Sincerely,

/s/ Alexandra B. Smith

John G. Welles,  
Regional Administrator

Enclosures

RECORD OF TELEPHONE CALL

DATE : 03-21-84 TIME: ~ 1:40 p.m. FILE NO. \_\_\_\_\_  
 FROM : Derrick Holson  
 TO : Bob Coffia 1-800-659-9175  
 SUBJECT: Grace Petroleum's unauthorized operation of Type II recovery  
 REMARKS: Wells in Montana - MTS21PE-007, EPU 110XD; MTS 2110W00B,  
Goings Gov't; MTS21PE-009, BWH Buck ELK.

Coffia and I discussed the matter of his Co's  
injection operations of the above ref. wells. I informed him  
that the Co. was currently without authorization to conduct  
injection operations at these well sites and should be  
discontinued. We discussed the letter / notice of def. that  
went out on 03-21-84, and the temporary permit  
provisions of the Regs at § 194.39. Coffia stated that  
he would like to settle the current non compliance  
issues (unauthorized injection) — he referred to "a token  
penalty of a few hundred dollars." I told him that the  
Region would be willing to discuss settlement with him, but  
that he should hasten getting a complete application in — after the  
compliance issue is settled — we will discuss settlement. He  
promised to get the application in before the week's end. I told him  
 ACTION REQUIRED:  
to refer questions on completing the permit to Laura Clemmens at  
844-2731

Derrick Holson  
 Signature

BUMBUB-005

10/2/84

(Principal)  
Johnson, Hannah (Atty.)

Meeting w/ Grace  
Petroleum

Emergency Permit:

Production delay

Here shut in highest water volume producers  
Producing at  $\frac{1}{2}$  Capacity.

144.34(a)(3) - will not work, only for new wells  
(WILL NOT WORK)

Of substantial production is not shown

within @ 30 day period - lease may be forfeited.

Trucking of water is not economically  
feasible - although it is practical.

\$50 / Barrel Disposal Chg  
\$ 7,000 / day - Trucking Chg.

Must go with #2 (144.34(a)(2))

Calls made in late July - to Dick - not returned  
Called Eagle - got info needed  
+ sent out permit. Calls made on 7/23, 7/24.

Matt Strever Called - got hold of Eagle  
Mailed app. on Weds. The 1<sup>st</sup>.

8WMDW051-016

10/2/84

(2)

Approx 15 weeks in field  
producing 157 SOPs  
produced by him.

! Emphasis is that contact was attempted  
from the Lakewood Office —

Office was cut way back in manpower  
from 26 to 5 people.

Hope that application ~~the~~ will prove that  
will ~~will~~ not violate 144.34(a)(3).

Grace has substantial investment in the field.  
But Pat states that it's a loss of the  
Nation's resources.

Basic showing is of irretrievable loss.  
Pat will research substantial.

- 1) Determine substantial irretrievable
- 2) Determine background of attempts to case
- 3) Determine that there is no migration  
of fluid.

\* Jim will be able to run radioactive  
tracers or etc. (NT's at any time).  
ASAP! Pressing up backside.

Pat: testing is not injection.

\* Call Jim + let him know what tests will be  
appropriate — tomorrow

Summers 1-017  
017

5/2/84

### Conclusions:

They will get back to us with substantiation  
of "substantial & measurable"  
+ other 2 criteria.

Also: I will review files & make notes  
as to what tests they should run to establish  
MI to our satisfaction.

Note - Though we may not grant them  
a temporary permit - we will have  
saved them the increment of time from  
the granting of the permit to the time they  
will be authorized to inject - by  
letting them know the tests that must be  
run prior to permit issuance.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION VIII  
1860 LINCOLN STREET  
DENVER, COLORADO 80295-0699

©  
Goings file

AUG 16 1984 - ORIGINAL IN EPU 110XD FILE

Ref: 8RC

Mr. James Johnson  
Grace Petroleum Corporation  
143 Union Boulevard, Suite 760  
Lakewood, Colorado 80228

Jim -  
Please call  
me if you have  
questions.  
John Heller

Dear Mr. Johnson:

On June 25, 1984, you were requested to submit Underground Injection Control (UIC) permit applications for the following wells:

EPU 110XD;  
Buck Elk No. 2;  
Goings Government;  
Huber No. 1;  
Huber No. 2.

The date for compliance was set at July 30, 1984.

Per the prescriptions of 40 C.F.R. Section 144.25(b) our notice to you included a statement of the reasons for our decision to require you to apply for a permit; an application form; a statement setting a reasonable time within which you were to submit the applications to this office; and a statement noting that on the effective date of the UIC permit, your authorization by rule to operate the designated wells would no longer apply.

On August 6 this office received applications for the EPU 110XD, Buck Elk No. 2 and Goings Government wells along with notice that the Huber No. 1 and Huber No. 2 wells are producers and therefore not covered by the UIC program.

Your failure to respond on or before July 30, 1984 is a violation of the Safe Drinking Water Act. Also, as stated in 40 C.F.R. Section 144.21(a)(2) your authorization by rule to operate the above designated wells has expired effective July 31. Any underground injection, except as authorized by rule or permit issued under the UIC program, is prohibited. Any injection operations at the designated wells after July 30 and prior to the issuance of a UIC permit from EPA constitutes continued violation of the Safe Drinking Water Act and subjects you to the liabilities therein prescribed.

sum 051-002

If you have any questions regarding this letter or the requirements under the UIC program, please contact Laura Clemmens at the EPA Denver Regional Office (303) 844-2731.

Sincerely,

A handwritten signature in black ink, appearing to be 'John G. Welles', written over a horizontal line.

John G. Welles  
Regional Administrator

8WMDWU51-003

AUG 8 1984

Ref: SWM-DW

James E. Johnson, Production Manager  
Grace Petroleum Corporation  
Suite 760  
143 Union Blvd.  
Lakewood, Colorado 80228

No. MTS21PE-0007  
MTS21PW-0008  
MTS21PE-0009

Dear Mr. Johnson:

This is to notify you that EPA received your application for three Underground Injection Control Permits on August 6, 1984 and that we are in the process of reviewing the applications for completeness. If you have any questions on these permits you should address them to Laura Clemmens at (303)844-2731.

Sincerely yours,

Roger E. Frenette, Chief  
Drinking Water Branch

*SWM-DW  
RFL long  
8/8/84*

*SWM-DW  
Cathy  
8/8/84*

AUG 8 1984

Ref: 8WM-DW

James E. Johnson, Production Manager  
Grace Petroleum Corporation  
Suite 760  
143 Union Blvd.  
Lakewood, Colorado 80228

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MTS21PW-0008  
MTS21PE-0009

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Sincerely yours,

Roger E. Frenette, Chief  
Drinking Water Branch

8WM-DW  
R.L. Long  
8/8/84

8WM-DW  
Crotty  
8/8/84

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE: August 6, 1984

SUBJECT: UIC Permit Calls - AJAX and Grace Petroleum

FROM: *Max*  
Max H. Dodson, Director  
Water Management Division

TO: The File

Called subject Companies on August 3 to remind them of their obligation to submit UIC permit applications and, because they had missed the July 30 date, they were in violation of the SDWA. Derrick Hobson accompanied me on the phone. AJAX claimed ignorance and stated general confusion on what we wanted; claimed he was a one-man operation and needed help. I advised him of the fact that two individuals were identified in the certified letter he signed for, who could have helped him fill out application. In conclusion, he would get in touch with Engle or Long. Jim Johnson from Grace was cooperative and said he had mailed their application certified mail on August 2. I checked with Drinking Water Branch clerical and no application had been received.

Talked to Vic Kimm later the same day and advised him of what we were doing. He said "great."

DRA briefed on phone conversation with Companies and she was advised to have John Welles sign letters regardless of response from Companies.

cc: Erenette  
Hobson*REF 8/7*



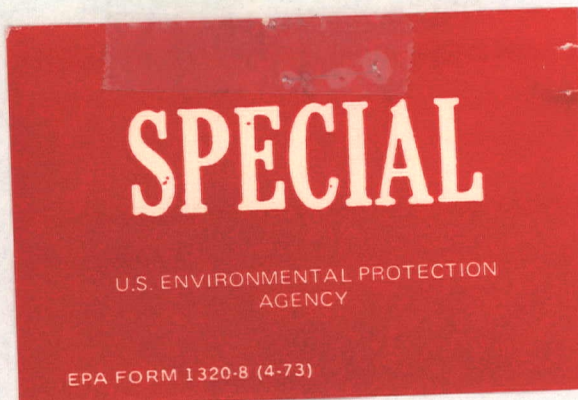
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION VIII  
1860 LINCOLN STREET  
DENVER, COLORADO 80295

MEMORANDUM

SUBJECT: FOI Request/January 22, 1985  
Records on W. R. Grace Co.  
Control No. (A-101) RIN-0399-85

FROM: Derrick Hobson

TO: Al Smith, Chief  
Water Branch



The Above referenced FOI Request was for "the EPA's record's on the W. R. Grace Co. and all its wholly owned subsidiaries, nationwide. Any records of investigations, suits/court actions, settlements and injunctions, and violation of EPA regulations (laws) are included in this request."

*All subsequent records are exempt due to enforcement proceedings. (circled) 2/11/85*

Under 40 C.F.R. Section 2.118(a), categories of matters which are exempt from mandatory disclosure under FOIA are explicitly delineated. "Investigatory records compiled for law enforcement purposes, but only to the extent that the production of such records would: (a) interfere with enforcement proceedings..." 40 C.F.R. Section 2.118(a)(f), is included as a category for exemptions from disclosure.

Accordingly, it is my opinion that all records retained by the Region on the W.R. Grace Co., after July 31, 1984,\* was done so for law enforcement purposes and that disclosure of such information, at this time, would interfere with what enforcement proceedings there might be extant, developing, and/or anticipated.

*D.H.*  
*1984-2*

\* The W. R. Grace Co., after July 31, 1985, became in non compliance with the requirements of the Safe Drinking Water Act, as promulgated in the Underground Injection Control Regulations at 40 C.F.R. Parts 122, 144, 146, and 147.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION VIII  
1860 LINCOLN STREET  
DENVER, COLORADO 80295

MEMORANDUM

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TO: Al Smith, Chief  
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All subsequent records are exempt due to enforcement proceedings.  
(R)  
2/11/85

1984-2

2-5-85

Laura -  
Attached is FOI request regarding Grace.  
Derrick and I discussed and you and  
I need to meet ...  
Derrick needs response by Tuesday 12<sup>th</sup> COB.

2.11.85 (7/8/9)

**FOI**

Dehrie  
Z

FROM WILKINSON, SCOTT S.			CONTROL NO. (A-101) RIN-0399-85
SUBJECT AND DATE  FOI REQUEST/January 22, 1985  Records on the W. R. GRACE CO.			DATE REC'D 02/01/85 - HQ 02/01/85 - RC
			DUE DATE 02/15/85
REFERRED (1) 8RC-Air, Water, and Waste chiefs	(2) 8WM	(3) 8A & T	(4) 8WASTE
DATE 02/04/85	02/04/85	02/04/85	02/04/85
REPLY SENT TO			DATE RELEASED
REMARKS ***SEND 3 COPIES OF REPLY TO FOI OFFICE, A-101 and, Direct reply. Send copy of billing form (EPA 2505-4), copy of reply and copy of control slip to 8RC in order to clear the record.			ACKNOWLEDGED - DATE  <input type="checkbox"/> NO ANSWER NEEDED  <input type="checkbox"/> (Explain in remarks)

FEB 01 1985 (A-101) RIN-397-85

10# 6625032

92:51 10/20

143

US ENVIRONMENTAL PROTECTION AGENCY TELECOMMUNICATIONS CENTER WASHINGTON, DC 20460		
<b>EPA</b>		
<b>FACSIMILE REQUEST AND COVER SHEET</b>		
PLEASE PRINT IN BLACK INK ONLY		
TO <i>Freedom of Information Officer Region 10</i>		
OFFICE PHONE		
REGION/LAB		
FROM <i>Vern A. Hancock</i>		
PHONE <i>382 4048</i>	MAIL CODE <i>A-101</i>	
OFFICE <i>Freedom of Information Office</i>		
DATE <i>2/1/85</i>	NUMBER OF PAGES TO INCLUDE THIS COVER SHEET <i>3</i>	
Please number all pages		
INFORMATION FOR SENDING FACSIMILE MESSAGES TO EPA HEADQUARTERS		
EQUIPMENT	FACSIMILE NUMBER NUMBER	VERIFICATION NUMBER
RAPICOM	(202) 382-7883 (auto)	(202) 382-2078
PANAFAX	(202) 382-7884 (auto)	(202) 382-2078
PANAFAX	(202) 382-7886 (auto)	(202) 382-2078
MANUAL	(202) 382-2078	
The EPA Communications Center has the capability for sending and receiving facsimile messages to CCITT Group I, II, and III Equipment		

20# 6625022

92:51 10/20

203

FROM WILKINSON, SCOTT S.			CONTROL NO. (A-101) RIN-0399-85
SUBJECT AND DATE  1/22/85  FREEDOM OF INFORMATION ACT REQUEST			DATE REC'D  2/1/85
			DUE DATE  2/15/85
REFERRED (1) FOI OFFICERS* REGIONS 1 thru 10	(2)	(3)	(4)
DATE 1/85			
REPLY SENT TO  *SEPARATE REPLIES			DATE RELEASED
REMARKS  DIRECT REPLY. SEND 3 COPIES OF REPLY TO FOI OFFICE, A-101  Rec'd By: _____  Date: _____			ACKNOWLEDGED - DATE  2/1/85 <input type="checkbox"/>
			NO ANSWER NEEDED  <input type="checkbox"/> (Explain in remarks)

EPA Form 5180-1 (6-72)  
REPLACES FWPCA FORM 72 AND  
NEW-73 WHICH MAY NOT BE USED.  
© EPA 1983-418-620

(Remove this copy only, do not separate remainder.)

MAIL CONTROL SCHEDULE

22:51 10/20

Pg 3

Dear Ms Greene,

01/22/85

Under the Freedom of Information Act, I am requesting the EPA's records on The W. R. Grace Co. and all its wholly owned subsidiaries, nationwide. Any records of investigations, suits/court actions, settlements and injunctions, and violations of EPA regulations (laws) are included in this request. I am especially interested in any records that name Mr Peter Grace as a principal.

I look forward to an expeditious response. I understand I may pay your costs.

Sincerely,

*Scott S. Wilkinson*

Scott S Wilkinson  
RFD #1  
Goffstown, NH 03045  
phone: (603) 529-1657

FOI Officers - Regions I thru X  
RIN - 0399-85

Done 2/15/85

RECEIVED

EPA/HDC/TS

FEB 1 1985

Freedom of Information Office  
Office of the Administrator

PS Form 3811, July 1982

- **SENDER:** Complete Items 1, 2, 3, and 4.  
Add your address in the "RETURN TO" space on reverse.

**(CONSULT POSTMASTER FOR FEES)**

1. The following service is requested (check one):
- ☐ Show to whom and date delivered .....
- ☐ Show to whom, date, and address of delivery .....
2. ☐ **RESTRICTED DELIVERY** .....
- (The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL \$ .....

3. ARTICLE ADDRESSED TO James Johnson  
Grace Petroleum Corporation  
143 Union Blvd., Suite 760  
Lakewood, CO 80228

4. TYPE OF SERVICE:
- ☐ REGISTERED ☐ INSURED
- ☒ CERTIFIED ☐ COD
- ☐ EXPRESS MAIL
- ARTICLE NUMBER P249835166

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☒ Authorized agent

5. DATE OF DELIVERY 6/25/84

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

\* GPO: 1982-379-583

# **P 249 835 166**

## **RECEIPT FOR CERTIFIED MAIL**

NO INSURANCE COVERAGE PROVIDED—  
NOT FOR INTERNATIONAL MAIL  
(See Reverse)

SENT TO		<u>James Johnson</u>	
STREET AND NO.		<u>143 Union Blvd., Suite 760</u>	
P.O., STATE AND ZIP CODE		<u>Lakewood, CO 80228</u>	
POSTAGE		\$ .....	
CONSULT POSTMASTER FOR FEES	OPTIONAL SERVICES	CERTIFIED FEE	\$ .....
		SPECIAL DELIVERY	\$ .....
		RESTRICTED DELIVERY	\$ .....
	RETURN RECEIPT SERVICE	SHOW TO WHOM AND DATE DELIVERED	\$ .....
		SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY	\$ .....
SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY		\$ .....	
TOTAL POSTAGE AND FEES		\$ .....	
POSTMARK OR DATE			
<u>6/25/84 JUN 29 1984</u>			

PS Form 3800, Apr. 1976

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JUN 25 1984

REF: 8WM-DW

Mr. James Johnson  
Grace Petroleum Corporation  
143 Union Boulevard, Suite 760  
Lakewood, Colorado 80228

Dear Mr. Johnson:

You are hereby requested to submit permit applications for the following wells by July 30, 1984:

FieldWell Name

East Poplar

EPU 110XD  
Buck Elk No. 2  
Huber No. 1  
Huber No. 2

NW Poplar

Goings Government

EPA is requiring permit applications for these wells for the following reasons: 1) The agency has determined that salt water disposal (SWD) wells pose a significant threat to Underground Sources of Drinking Water (USDW's) in this area and is therefore permitting them as soon as possible, and; 2) EPA has received assertions from the Bureau of Indian Affairs (BIA) of ground water contamination as a possible result of salt water disposal activities on the Fort Peck Indian Reservation. Since the East Poplar and Northwest Poplar fields are the area of greatest concern to the tribe and the BIA, we are requesting that permit applications for wells from these fields be submitted first.

Please complete one of the enclosed application forms for each well listed by July 30, 1984. Be sure that all the applications are complete and that all required attachments are included. Submit the completed applications to:

Chief, Drinking Water Branch  
U.S. Environmental Protection Agency (8WM-DW)  
1860 Lincoln Street  
Denver, Colorado 80295

## CONCURRENCES

SYMBOL	8MO	8MO					
SURNAME	Engel	Engel					
DATE	6-29-84	6-29-84					

The SWD wells listed above may continue to operate under current authorization by rule until:

The effective date of a permit (activities will then be authorized by permit);

The denial of a permit (the well will no longer be authorized to inject); or

The owner or operator fails to submit the permit application within the time period specified in this notice (at which time the authorization to inject will be revoked).

I encourage you to contact either Richard Long in the EPA Denver Regional Office (Phone: (303) 844-3914) or William Engle in the EPA Montana Operations Office (Phone: (406) 449-5414) as soon as possible if you have any questions.

Sincerely yours,

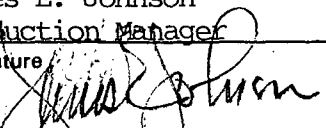


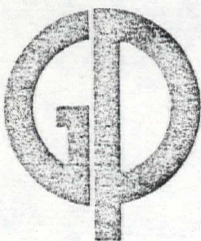
John F. Wardell, Director,  
Montana Office

Enclosures: Permit Application Forms

Permit Application & Attachments  
(P&A Approval Request)

Correspondence to EPA

Form <b>4</b> UIC	UNITED STATES ENVIRONMENTAL PROTECTION AGENCY <b>UNDERGROUND INJECTION CONTROL PERMIT APPLICATION</b> <i>(Collected under the authority of the Safe Drinking Water Act, Sections 1421, 1422, 40 CFR 144)</i>	I. EPA ID NUMBER <div style="border: 1px solid black; height: 20px; width: 100%;"></div> T/A C <div style="border: 1px solid black; height: 20px; width: 100%;"></div> U																																											
READ ATTACHED INSTRUCTIONS BEFORE STARTING FOR OFFICIAL USE ONLY																																													
Application approved <small>mo day year</small>	Date Received <small>mo day year</small>	Permit/Well Number	Comments																																										
<div style="border: 1px solid black; height: 20px; width: 100%;"></div>	<div style="border: 1px solid black; height: 20px; width: 100%;"></div>	<div style="border: 1px solid black; height: 20px; width: 100%;"></div>	<div style="border: 1px solid black; height: 20px; width: 100%;"></div>																																										
II. FACILITY NAME AND ADDRESS		III. OWNER/OPERATOR AND ADDRESS																																											
Facility Name EPU 110-XD		Owner/Operator Name Grace Petroleum Corporation																																											
Street Address East Poplar Field		Street Address 143 Union Blvd. - Ste 760																																											
City Poplar	State MT	ZIP Code	City Lakewood																																										
			State CO																																										
			ZIP Code 80228																																										
IV. OWNERSHIP STATUS (Mark 'x')		V. SIC CODES																																											
<input type="checkbox"/> A. Federal <input checked="" type="checkbox"/> B. State <input type="checkbox"/> C. Private <input type="checkbox"/> D. Public <input type="checkbox"/> E. Other (Explain)		<div style="border: 1px solid black; height: 20px; width: 100%;"></div>																																											
VI. WELL STATUS (Mark 'x')																																													
<input checked="" type="checkbox"/> A. Operating Date Started <small>mo day year</small> 10 73		<input type="checkbox"/> B. Modification/Conversion <input type="checkbox"/> C. Proposed																																											
VII. TYPE OF PERMIT REQUESTED (Mark 'x' and specify if required)																																													
<input checked="" type="checkbox"/> A. Individual <input type="checkbox"/> B. Area <input checked="" type="checkbox"/> C. Other		Number of Existing wells 1	Number of Proposed wells 0																																										
		Name(s) of field(s) or project(s) East Poplar																																											
VIII. CLASS AND TYPE OF WELL (see reverse)																																													
A. Class(es) (enter code(s))	B. Type(s) (enter code(s))	C. If class is "other" or type is code "x," explain																																											
11	D																																												
IX. LOCATION OF WELL(S) OR APPROXIMATE CENTER OF FIELD OR PROJECT			X. INDIAN LANDS (Mark 'x')																																										
<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <th colspan="3">A. Latitude</th> <th colspan="3">B. Longitude</th> <th colspan="4">Township and Range</th> <th colspan="2"></th> <th colspan="2"></th> </tr> <tr> <th>Deg</th><th>Min</th><th>Sec</th> <th>Deg</th><th>Min</th><th>Sec</th> <th>Twp</th><th>Range</th><th>Sec</th><th>1/4 Sec</th> <th>Feet from</th><th>Line</th> <th>Feet from</th><th>Line</th> </tr> <tr> <td></td><td></td><td></td> <td></td><td></td><td></td> <td>28N</td><td>51E</td><td>10</td><td>SE</td> <td>1525</td><td>S</td> <td>660</td><td>E</td> </tr> </table>			A. Latitude			B. Longitude			Township and Range								Deg	Min	Sec	Deg	Min	Sec	Twp	Range	Sec	1/4 Sec	Feet from	Line	Feet from	Line							28N	51E	10	SE	1525	S	660	E	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
A. Latitude			B. Longitude			Township and Range																																							
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						28N	51E	10	SE	1525	S	660	E																																
XI. ATTACHMENTS																																													
(Complete the following questions on a separate sheet(s) and number accordingly; see instructions) FOR CLASSES I, II, III (and other classes) complete and submit on separate sheet(s) Attachments A — U (pp 2-6) as appropriate. Attach maps where required. List attachments by letter which are applicable and are included with your application:																																													
XII. CERTIFICATION																																													
I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR 144.32)																																													
A. Name and Title (Type or Print) James E. Johnson Production Manager			B. Phone No. (Area Code and No.) 303-980-9130																																										
C. Signature 			D. Date Signed																																										



August 1, 1984

Grace Petroleum Corporation  
Subsidiary of W. R. Grace & Co.

Suite 760  
143 Union Blvd.  
Lakewood, Colorado 80228  
Phone (303) 980-9130

Chief, Drinking Water Branch  
U. S. Environmental Protection Agency (8 WM-DW)  
1860 Lincoln Street  
Denver, Colorado 80295

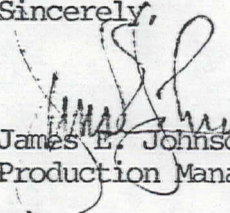
Re: EPU 110-XD  
Goings Government  
Buck Elk #2  
Huber #1  
Huber #2  
Roosevelt County, Montana

Gentlemen:

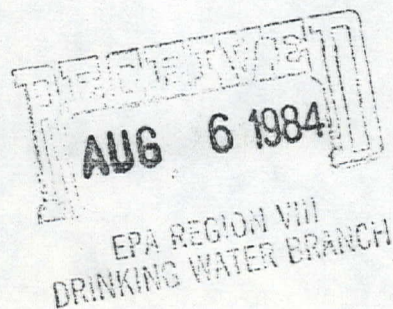
Enclosed please find the requested EPA Form #4 for the above-captioned wells. The Huber #1 and #2 are producing wells which are incorrectly on your list.

If you need any further assistance, please contact the undersigned.

Sincerely,

  
James E. Johnson  
Production Manager

Enclosures



RECORD OF TELEPHONE CALL

DATE: 8/20 What year 2004? TIME: 1:45 FILE NO. \_\_\_\_\_

FROM: Mike Striely

TO: Sandra Clemmens

SUBJECT: Grace Petroleum - Populav Field

REMARKS:

Received a call from Bob Coffia  
(405) 840-6657, Grace Petroleum, Okla City,  
Ok.

He was concerned about a letter  
discussing missed permit application  
deadline of July 30. He wanted to  
negotiate regarding operation of wells.  
He didn't want to shut down wells  
due to potential loss of income and  
he didn't want to haul water because  
he said it would violate BLM  
Permit Conditions.

I told him I would check on  
and have you or Derrick call  
him back

ACTION REQUIRED:

8/20 Derrick is calling Coffia. Has copy of letter of  
Agency - signed 8/21.

Mike Striely  
Signature

20040821-004

RECORD OF COMMUNICATION		<input checked="" type="checkbox"/> PHONE CALL <input type="checkbox"/> DISCUSSION <input type="checkbox"/> FIELD TRIP <input type="checkbox"/> CONFERENCE <input type="checkbox"/> OTHER (SPECIFY)	
		(Record of item checked above)	
TO:	FROM:		DATE
Laura Clemmens	Phil 980-9130 Don Smith GRACE PETROLEUM		8-28-84
SUBJECT		TIME	
Letter of Deficiency: Wells # EPU110XD, Buck Elk, Goings Govt.		4:30	
SUMMARY OF COMMUNICATION			
<p>1. Smith is currently working on fulfilling all requirements listed in letter, dated 8/20/84. He plans on getting the information to us by 8/30 or 8/31.</p> <p>2. Told me that if they shut in the 3 wells referenced above, that they would lose 150 BOPD, <del>and would</del> If they had to haul the water, they would have to haul a volume of 2,500 BOPD. Besides they have no where to haul it to, nor the permit to do so.</p> <p>3. Was only able to give us an "estimated" fracture gradient/pressure for the confining layers - since the actual figures <sup>are</sup> not known in those specific areas. Obviously, he doesn't want to test the formation to discover the frac pressure, because in doing so, he'd crack the confining layer! I ok'd the estimate.</p>			
CONCLUSIONS, ACTION TAKEN OR REQUIRED			
(Blind Note) - Smith made mention of his frustration with duplicative + confusing regulation, and blaming it on "those folks at HQ" made a veiled threat! He asked me if I knew who Peter Grace was, I said yes, and he responded that "after the election, Mr. Grace will have those folks at HQ taken care of." Smith noted that the power on high were very unhappy w/ BKA.			
INFORMATION COPIES			
TO: CROTTY, FILE, HOBSON, LONG			

## WATER ANALYSIS RESULTS

[illegible]

5412

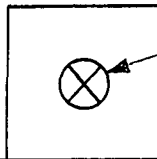
M.

EPU 110XD

T28N-R51E Sec 10

Roosevelt County, Montana

7-30-84



Wellhead

Guard Rail

Pump Shed

Wellhead:

(2) 3000psi w.p. WKM  
Master Valves, 2 1/2"

2 1/2" x 7 1/16" (6") 5000 psi  
4600 Series Tubing Hanger  
Flange

300 Bbl  
Fiberglass Tank

4" Overflow Line

85' x 85' Lined  
Overflow Pit  
(Fenced + Flagged)

42,381 50 SHEETS 5 SQUARE  
42,382 100 SHEETS 5 SQUARE  
42,383 100 SHEETS 5 SQUARE  
42,384 100 SHEETS 5 SQUARE  
42,385 100 SHEETS 5 SQUARE  
42,386 100 SHEETS 5 SQUARE  
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42,400 100 SHEETS 5 SQUARE



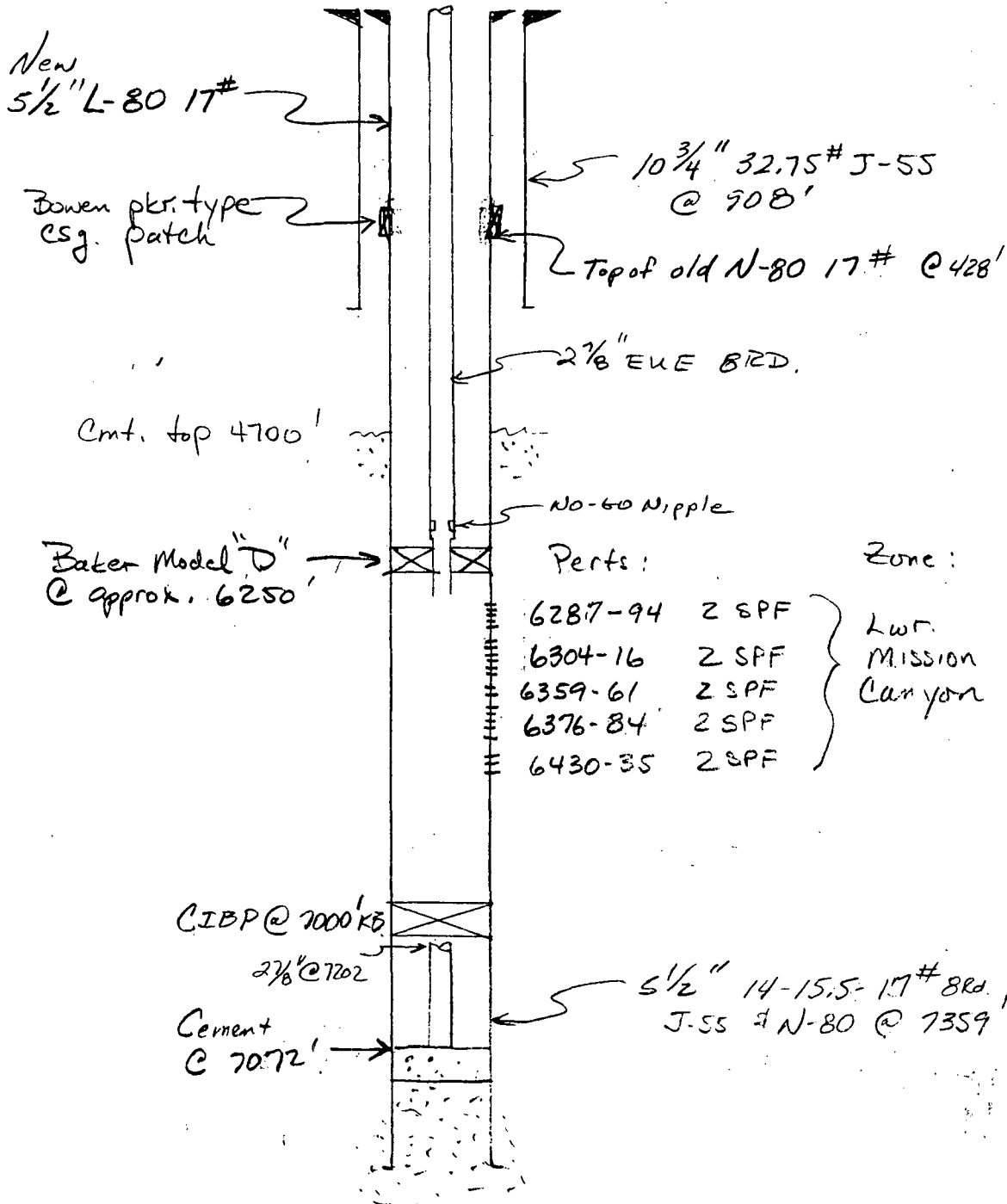
M.

1-XD EAST POPLAR FIELD

1/81 *W. J. Jathas*

WELLBORE SCHEMATIC  
EPU 110 XD

checked by MPS  
7-18-84



OIL AND GAS CONSERVATION COMMISSION  
OF THE STATE OF MONTANA  
HELENA

BOND

Serial No. ....

KNOW ALL MEN BY THESE PRESENTS, That we, GRACE PETROLEUM CORPORATION  
(Name)

Address 6501 N. BROADWAY, OKLAHOMA CITY,  
of the County of OKLAHOMA in the State of OKLAHOMA  
as Principal, and THE TRAVELERS INDEMNITY COMPANY  
of HARTFORD, CONNECTICUT

as Surety, authorized to do business in the State of Montana, are held and firmly bound unto the State of Mon-  
tana, in the penal sum of TEN THOUSAND AND NO/100----- (\$10,000.00.....),  
lawful money of the United States, for which payment, well and truly to be made, we bind ourselves, and each  
of us, and each of our heirs, executors, administrators or successors, and assigns jointly and severally, firmly by  
these presents.

The condition of this obligation is that whereas the above bounden principal..... propose..... to drill a well  
or wells for oil, gas, or stratigraphic purposes in and upon the following described land situated within the State  
of Montana, to-wit:

BLANKET

NOW, THEREFORE, if the above bounden principal shall comply with all of the provisions of the laws of  
the State of Montana and the rules, regulations and orders of the Oil and Gas Conservation Commission of the  
State of Montana, especially with reference to the proper plugging of said well or wells, and filing with the Oil  
and Gas Conservation Commission of the State of Montana all notices and records required by said Commission,  
in the event said well or wells do not produce oil or gas in commercial quantities, or cease to produce oil or gas  
in commercial quantities, then this obligation is void; otherwise, the same shall be and remain in full force and  
effect.

Witness our hands and seals, this 31st day of AUGUST, 19 78.

ATTEST:

GRACE PETROLEUM CORPORATION

*James A. Thomas*  
Assistant Secretary

*H. C. Victory*  
Vice President Principal.

Witness our hands and seals, this..... day of....., 19.....

Countersigned: ....., 19.....

By *John T. Lurson*  
(Montana Resident Agent)  
Address *Box 20067*  
*Billings, MT. 59104*

THE TRAVELERS INDEMNITY COMPANY  
Surety.

*John R. Mackey*  
John R. Mackey, Attorney-In-Fact

(If the principal is a corporation, the bond should be executed by its duly authorized officers, with the seal of the cor-  
poration affixed. When principal or surety executes this bond by agent, power of attorney or other evidence of authority  
must accompany the bond.)

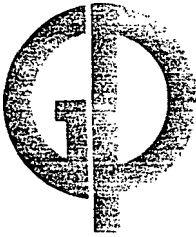
Approved....., 19.....

OIL AND GAS CONSERVATION COMMISSION  
OF THE STATE OF MONTANA.

By.....  
Executive Secretary or Counsel.

April 1, 1979

(Over)



Donald L. Sterne  
Vice President - General Manager  
Western Region

**Grace Petroleum Corporation**  
Subsidiary of W. R. Grace & Co.

Broadway Executive Park  
6501 North Broadway  
Oklahoma City, Oklahoma 73116  
Phone (405) 840-6905

23 August 1984

Mr. John G. Welles  
Administrator, Region VIII  
U. S. Environmental Protection Agency  
1860 Lincoln Street  
Denver, Colorado 80295

Dear Mr. Welles:

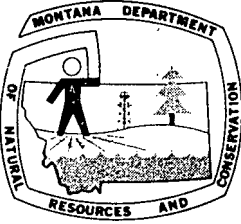
With reference to 40 CRF Section 144.32b. of April 1, 1983, regarding application for permits to operate Class II wells, please accept this letter as authority for the Denver Operations Manager of Grace Petroleum Corporation to sign all permit applications and reports in connection with administration of underground injection control programs within the jurisdiction of EPA Region VIII.

Please be advised that the current Manager of Operations in our Denver office is James E. Johnson, who is responsible for production in Montana, North Dakota, South Dakota, Nebraska, Wyoming, Colorado, Utah, and New Mexico.

Yours very truly,

Donald L. Sterne  
Vice President, General Manager  
Western Region

DLS:BJC:k



# MONTANA DEPARTMENT OF NATURAL RESOURCES AND CONSERVATION

THOMAS L. JUDGE, GOVERNOR

~~JOHN L. CORTH~~ DIRECTOR

## BOARD OF OIL AND GAS CONSERVATION

### BOARD MEMBERS

RICHARD A. CAMPBELL, CHAIRMAN  
CARL J. IVERSON, VICE-CHAIRMAN  
MILTON G. ANDERSON  
PAUL C. BUNN  
JOHN P. MOORE

January 12, 1979

Grace Petroleum Corporation  
6501 N. Broadway  
Oklahoma City, Oklahoma 73125

RE: \$10,000.00 Blanket Bond  
No. 574E0693 replaces  
Polumbus Petroleum Corporation  
No. 835316

Gentlemen:

The Board of Oil and Gas Conservation in regular session on January 11, 1979 gave formal approval to your \$10,000.00 Blanket Bond No. 574E0693. Subject bond is in force and effect on and after the 31st day of August, 1978, the date on which it was signed and sealed. This bond replaces Polumbus Petroleum Corporation, Seaboard Surety Co. Bond No. 835316.

Yours very truly,

*Donald E. Chisholm*  
Donald E. Chisholm  
Executive Secretary

DEC/ml

cc: The Travelers Indemnity Company  
One Tower Square  
Hartford, CT. 06115

J & A Insurance Association  
Jack T. Lawson  
P.O. Box 20067  
Billings, Montana 59104

Billings

Shelby

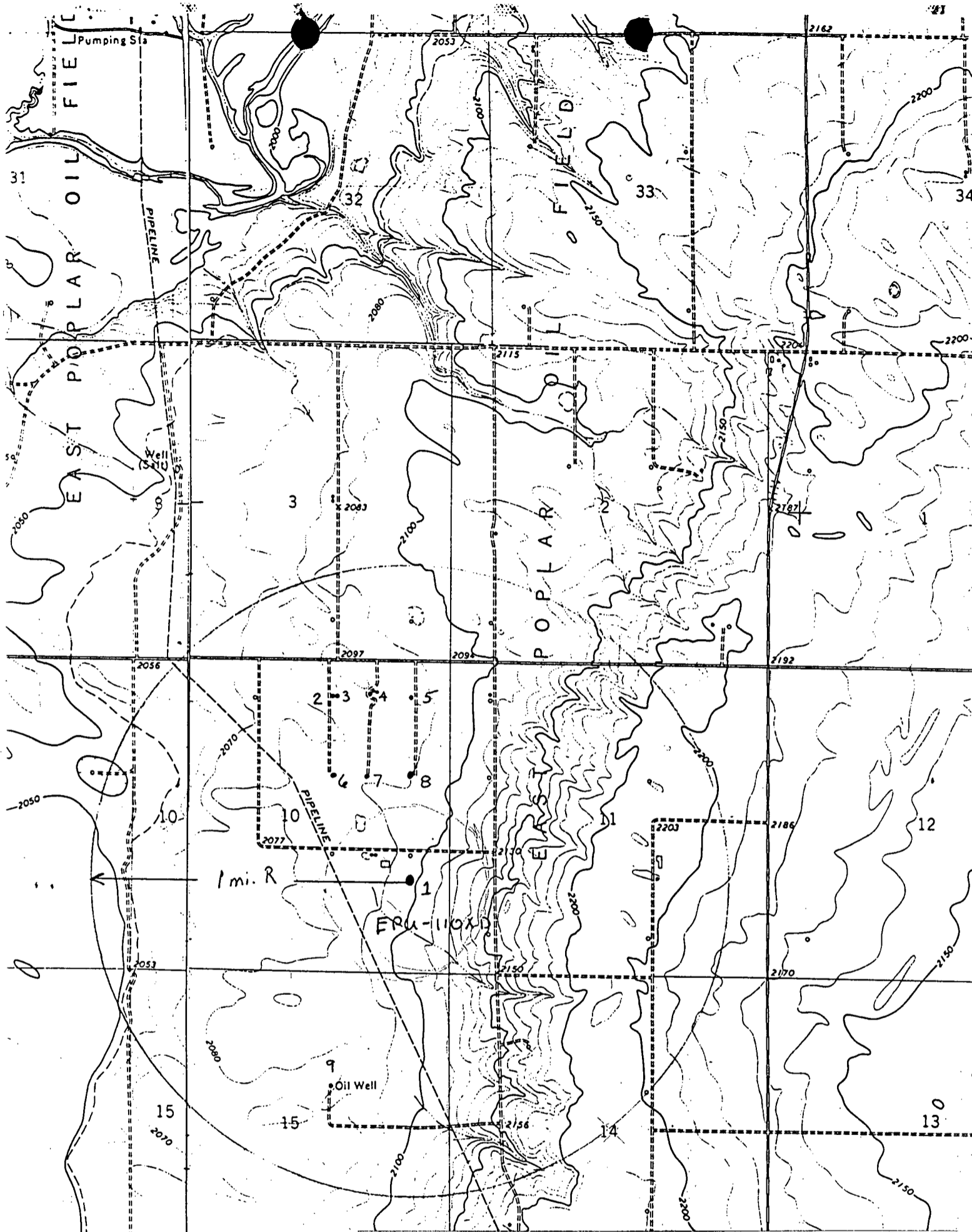
RECEIVED			
JAN 12 1979			
FEDERAL BUREAU OF INVESTIGATION			
U.S. DEPARTMENT OF JUSTICE			
Washington, D.C. 20535			
Capital	AFE	<input type="checkbox"/>	No <input type="checkbox"/>
Expense	AFE	<input type="checkbox"/>	No <input type="checkbox"/>
Approved _____			

DIVISION OFFICE  
325 FULLER AVE.  
P.O. BOX 217  
HELENA, MONTANA 59601  
(406) 449-2611  
ADMINISTRATOR - DON CHISHOLM

TECHNICAL  
AND SOUTHERN FIELD OFFICE  
15 POLY DRIVE  
BILLINGS, MONTANA 59101  
(406) 252-5109  
PETROLEUM ENGINEER - JUDSON SWEET  
GEOLOGIST - CHARLES MAIO

NORTHERN FIELD OFFICE  
218 MAIN STREET  
P.O. BOX 690  
SHELBY, MONTANA 59474  
(406) 434-2422





Spot. #	Well Name
1	EPU 110-XD
2	Huber 4 SWD (TA)
3	Huber 4A
4	Huber 1 SWD (TA)
5	Huber 3 (TA)
6	Huber 2
7	Huber 5
8	Huber 1
9	EPU 32 (non-oper.)

Grace Petroleum Corporation

Grace Petroleum Corporation  
143 Union Blvd. o Suite 760  
Lakewood, CO 80228

U.S. Environmental Protection Agency  
1860 Lincoln Street  
Denver, CO 80295

E.P.A.  
RECEIVED  
OCT 1 1984  
AIR QUALITY  
DIVISION

84 SEP 7 P 3:03

RECEIVED

*Link*